

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No: 08-35653-KRH
	:	
Debtors	:	(Jointly Administered)
	:	
	:	

MOTION TO ADMIT PRO HAC VICE

Neil E. McCullagh, Esquire moves this Court for an Order permitting David Honig, Esquire ("Mr. Honig") to appear and represent Cleveland Construction, Inc. *pro hac vice* in the above-styled bankruptcy cases and any related adversary litigation, and in support of his Motion, states as follows:

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with Mr. Honig in this matter. My business address and bar number are as follows:

Neil E. McCullagh (VSB #39027)
Spotts Fain PC
411 E. Franklin Street, Suite 600
Richmond, VA 23219

2. Mr. Honig is a member in good standing of the Bar of the State of Ohio, the state of his residence, and is admitted to practice before the United States District Courts for the Northern and Southern Districts of Ohio. His business address is as follows:

David Honig, Esquire (Bar #0079781)
Cleveland Construction, Inc.
5390 Courseview Drive
Mason, OH 45040
Phone: (513) 339-2382
Facsimile: (513) 398-6838

Co-Counsel for Cleveland Construction, Inc.

Robert H. Chappell, Esquire (VSB#31698)
Neil E. McCullagh, Esquire (VSB #39027)
Jennifer J. West, Esquire (VSB #47522)
Erin E. Kessel, Esquire (VSB #65360)
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Phone: (804) 697-2000
Facsimile: (804) 697-2100

Co-Counsel for Cleveland Construction, Inc.

Cleveland Construction, Inc.
5390 Courseview Drive
Mason, OH 45040

3. Mr. Honig has not been the subject of disciplinary action by the Bar or courts of the State of Ohio, or any state or any Federal Court.

4. Mr. Honig has not been denied admission to the courts of any state or to any Federal Court.

5. Mr. Honig has completed an Application to Qualify As A Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2), a copy of which is attached as **Exhibit A.**

WHEREFORE, Neil E. McCullagh, Esquire prays that this Court grant his Motion to permit David Honig, Esquire to represent Cleveland Construction, Inc. *pro hac vice* in this case and for such other and further relief as this Court deems just and proper.

Respectfully submitted this 3rd day of June, 2011,

/s/ Neil E. McCullagh

Robert H. Chappell, Esquire (VSB #31698)
Neil E. McCullagh, Esquire (VSB #39027)
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411 East Franklin Street, Suite 600
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Phone: (804) 697-2000
Facsimile: (804) 697-2100
Co-Counsel for Cleveland Construction, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of June, 2011, a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid and/or electronic means through the Court's ECF system on the following, constituting all necessary parties:

Andrew W. Caine, Esquire
Jeffrey Nolan, Esquire
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Lynn L. Tavenner, Esquire
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Office of the U.S. Trustee
Attn: Robert Van Arsdale, Esquire
701 East Broad Street
Suite 4304
Richmond, VA 23219

/s/ Neil E. McCullagh